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9 *Counsel for Defendant Idaho Specialized*
10 *Transportation, Inc. d/b/a Transgroup*
11 *Worldwide Logistics*

12 UNITED STATES BANKRUPTCY COURT
13 SOUTHERN DISTRICT OF NEW YORK

14 In re:

15 RUNWAY LIQUIDATION HOLDINGS, LLC, et al.,
16 Debtors.

17 _____
18 Runway Liquidation, LLC

19 Plaintiff,

20 v.

21 IDAHO SPECIALIZED TRANSPORTATION INC.
22 d/b/a TRANSGROUP WORLDWIDE LOGISTICS,

23 Defendant.

Chapter 11

CASE NO. 17-10466-SCC

(Jointly Administered)

Adversary No. 19-01048-SCC

**DEFENDANTS' ANSWER AND
AFFIRMATIVE DEFENSES**

24 Defendant Idaho Specialized Transportation Inc. d/b/a Transgroup Worldwide Logistics
25 ("Transgroup") answers the allegations in plaintiff's Complaint as follows:

- 26
1. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 1
of the complaint and therefore denies the same.

2. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 2 of the complaint and therefore denies the same.
3. Defendant admits the allegations in paragraph 3 of the complaint.
4. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 4 of the complaint and therefore denies the same.
5. Defendant admits the allegations in paragraph 5 of the complaint.
6. Defendant admits the allegations in paragraph 6 of the complaint.
7. Defendant admits the allegations in paragraph 7 of the complaint.
8. Defendant is without sufficient knowledge to admit or deny the allegations in paragraph 8 of the complaint and therefore denies the same.
9. Defendant denies the allegations in paragraph 9 of the complaint.
10. Defendant denies the allegations in paragraph 10 of the complaint.
11. Paragraph 11 of the complaint is a legal conclusion that requires no answer. To the extent an answer is required, defendant denies.
12. For answer to paragraph 12, defendant repeats its answers above.
13. Defendant denies the allegations in paragraph 13 of the complaint.
14. Defendant denies the allegations in paragraph 14 of the complaint.
15. Defendant denies the allegations in paragraph 15 of the complaint.
16. Defendant denies the allegations in paragraph 16 of the complaint.
17. Defendant denies the allegations in paragraph 17 of the complaint.
18. Defendant denies the allegations in paragraph 18 of the complaint.
19. Defendant denies the allegations in paragraph 19 of the complaint.
20. Defendant denies the allegations in paragraph 20 of the complaint.
21. Defendant denies the allegations in paragraph 21 of the complaint.
22. For answer to paragraph 22, defendant repeats its answers above.
23. Defendant denies the allegations in paragraph 23 of the complaint.

24. Defendant denies the allegations in paragraph 24 of the complaint.

25. Defendant denies the allegations in paragraph 25 of the complaint.

Having answered the allegations in plaintiff's complaint, defendant asserts the following

AFFIRMATIVE DEFENSES:

1. Failure to name the real party interest.
2. Defendant did not receive any transfers from any of the debtors.
3. To the extent defendant did receive transfers from a debtor, such transfers are protected by the ordinary course of business defense and/or new value defense in 11 U.S.C. §§547(c)(2) and (4).

REQUEST FOR RELIEF

Based on the foregoing, defendants request relief as follows:

1. Dismissal of plaintiff's claims with prejudice and that plaintiff take nothing thereby;
2. For such other and further relief the Court deems just and equitable.

DATED this 7th day of May, 2019.

TOUSLEY BRAIN STEPHENS PLLC

By: s/ Kevin A. Bay

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Attorney for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on May 7, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all parties registered on the CM/ECF system. All other parties (if any) shall be served in accordance with the Federal Rules of Civil Procedure.

Executed this 7th day of May, 2019, at Seattle, Washington.

/s/ Kevin A. Bay

Kevin A. Bay, WSBA #19821

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